

NICHOLAS A. TRUTANICH  
United States Attorney  
Nevada Bar Number 13644  
JARED L. GRIMMER  
Assistant United States Attorney  
501 Las Vegas Boulevard South, Suite 1100  
Las Vegas, Nevada 89101  
Telephone: 702-388-6378  
jared.l.grimmer@usdoj.gov

*Attorneys for Plaintiff  
The United States of America*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

GERARDO RIVERA-ROSALES,

Defendant.

Case No. 2:20-mj-1110-BNW

**Stipulation for an Order  
Directing Probation to Prepare  
a Criminal History Report**

IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A. Trutanich, United States Attorney, and Jared L. Grimmer, Assistant United States Attorney, counsel for the United States of America, and Raquel Lazo, Assistant Federal Public Defender, counsel for Defendant GERARDO RIVERA-ROSALES, that the Court direct the U.S. Probation Office to prepare a report detailing the defendant's criminal history.

This stipulation is entered into for the following reasons:

1. The United States Attorney's Office has developed an early disposition program for immigration cases, authorized by the Attorney General pursuant to the

1 PROTECT ACT of 2003, Pub. L. 108-21. Pursuant to this program, the government has  
2 extended to the defendant a plea offer in which the parties would agree to jointly request an  
3 expedited sentencing immediately after the defendant enters a guilty plea.

4 2. The U.S. Probation Office cannot begin obtaining the defendant's criminal  
5 history until after the defendant enters his guilty plea unless the Court enters an order  
6 directing the U.S. Probation Office to do so. Such an order is often entered in the minutes of  
7 a defendant's initial appearance when charged by indictment.


8 3. The U.S. Probation Office informs the government that it would like to begin  
9 obtaining the criminal history of defendants eligible for the early disposition program as  
10 soon as possible after their initial appearance so that the Probation Office can complete the  
11 Presentence Investigation Report by the time of the expected expedited sentencing.

12 4. Accordingly, the parties request that the Court enter an order directing the  
13 U.S. Probation Office to prepare a report detailing the defendant's criminal history.

14 DATED this 6th day of January, 2021.

15 Respectfully submitted,

16 NICHOLAS A. TRUTANICH  
17 United States Attorney

18   
19 RAQUEL LAZO  
20 Assistant Federal Public Defender  
Counsel for Defendant GERARDO  
RIVERA-ROSALES

21 /s/ Jared L. Grimmer  
22 JARED L. GRIMMER  
23 Assistant United States Attorney  
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1                                   **UNITED STATES DISTRICT COURT**  
2                                   **DISTRICT OF NEVADA**

3 UNITED STATES OF AMERICA,

4                                   Plaintiff,

5                                   v.

6 GERARDO RIVERA-ROSALES,

7                                   Defendant.

Case No. 2:20-mj-1110-~~BNW~~ NJK

**Order Directing Probation to Prepare  
a Criminal History Report**  
**[Proposed]**

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9                   Based on the stipulation of counsel, good cause appearing, and the best interest of  
10 justice being served:

11                  IT IS HEREBY ORDERED that the U.S. Probation Office is directed to prepare a  
12 report detailing the defendant's criminal history.

13                  Dated: January 11, 2021

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15                                     
16                                   Nancy J. Koppe  
17                                   United States Magistrate Judge  
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